

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Implementation of Section 621(a)(1) of the Cable)	MB Docket No. 05-311
Communications Policy Act of 1984 as Amended)	
by the Cable Television Consumer Protection and)	
Competition Act of 1992)	

COMMENTS OF CAMBRIDGE PUBLIC ACCESS CORPORATION

Cambridge Public Access Corporation, dba Cambridge Community Television (CCTV) appreciates the opportunity to file comments on the Second Further Notice and Proposed Rulemaking (“FNPRM”) in the above-referenced docket.

CCTV is a nationally recognized community media center, with a history of innovation and accomplishment. Key initiatives include:

- A Media Production and Technology Education Program: CCTV offers an extensive hands-on training program providing access to emerging technologies and state-of-the-art media equipment, from cameras and computers to social media, animation and virtual reality. Classes are offered to the general public, with specialized programs for seniors, youth, citizen journalists, nonprofits, and city agencies.
- Specialized Outreach Initiatives:
 - Digital Storytelling: Through CCTV’s Digital Storytelling program we have worked with a group of Palestinians, Jordanians and Israelis, seniors from the Cambridge Senior Center, teens in the Youth Media Program, and others. We currently offer Digital Storytelling in collaboration with the Cambridge Public Library genealogy workshops and with MIT’s Priscilla King Gray Community Service Center.
 - Digital Equity: In 1996, CCTV opened one of the first computer labs located in a public access television station to provide computer and Internet access to people who might not otherwise have it. CCTV has continued to provide leadership in this area, receiving a Cambridge First Day Award from MIT and the City of Cambridge, serving as Project Manager for the Newtowne Court Digital Divide initiative, and, more recently, serving on the City's Municipal Broadband Task Force.
- Media Distribution Platforms: CCTV programs three local cable channels that reach over 30,000 homes, featuring programming in English and other languages produced by Cambridge residents, nonprofits, arts and cultural organizations and City agencies, a dynamic, media-rich website, including the [Cambridge Media Map](#), the [Cambridge Calendar](#), and live streams of the three cable channels, a Youtube channel, and active social media accounts.

- Facilities: CCTV manages 3 studios, 2 edit suites, 2 computer labs, new podcast space, a gallery and a Teen Work & Learning Center.

CCTV strongly opposes the proposal that cable-related in-kind services would be counted against the franchise fees Comcast pays to the City of Cambridge. Such an action would decimate our ability to provide services to our community. The cable-related services that CCTV provides bring added value to the Cambridge cable system and serve not only the cable subscribers, but constituencies throughout the community. These in-kind services have been whittled away over the past 30+ years from what was once a generous package to the bare minimum required for the local channels to get a signal to the subscribers. It has been the understanding throughout these license periods that the PEG entities would provide programming to the subscribers in exchange for these in-kind services. The costs related to franchise fees are actually passed on to the subscribers and do not come from the profits of Comcast; this action is simply a means of limiting the fees cable companies pay for the use of the public rights of way.

In the past year, CCTV has provided media production services to over 100 nonprofits, sharing their issues and events with the public on our channels. In the shadow of the Boston media market, which pays scant attention to Cambridge, we produced 21 hours of LIVE local election programming and our channels carried 66 series in languages other than English. Over 50 teens were engaged in our Youth Media Program, and we served over one hundred seniors in our computer lab.

Just this year, we have experienced a 7% drop in cable revenue as a result of changes in GAAP. If these proposed rules are adopted, depending on what will be a very arbitrary determination of the value of in-kind services, we will need to lay off a majority of our staff and cease much of our operations.

In summary, we reject that this proposed rulemaking is anything other than an attempt to further limit cable companies' responsibilities to pay for their use of the public rights of way, as well as to undermine the spirit of the historical decisions that laid the groundwork requiring these entities to provide community access to the cable systems.

We appreciate the opportunity to add to the record in this proceeding.

Respectfully submitted,



Susan Fleischmann
Executive Director
Cambridge Public Access Corporation
dba Cambridge Community Television

November 9, 2018